

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, et al., Debtors. ¹	PROMESA Title III No. 17-BK-3283-LTS (Jointly Administered)
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In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO SALES TAX FINANCING CORPORATION (“COFINA”) <i>et al.</i> , Debtor.	PROMESA Title III No. 17-BK-3284-LTS
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**URGENT UNOPPOSED MOTION SEEKING EXTENSION OF DEADLINE TO
FILE APPLICATION FOR FINAL ALLOWANCE OF COMPENSATION**

To the Honorable United States District Court Judge Laura Taylor Swain:

O’Neill & Borges LLC (“O’Neill”), as attorneys for the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as representative of the Puerto Rico

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Sales Tax Financing Corporation (“COFINA” or “Debtor”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully submit this motion (the “Motion”), for entry of an order, substantially in the form attached hereto as **Exhibit A**, extending the deadline for O’Neill to file its final application for allowance of compensation pursuant to the *Order and Judgment Confirming the Third Amended Title III Plan of the Puerto Rico Sales Tax and Financing Corporation* (the “Confirmation Order”) [ECF No. 561]. In support of this Motion, O’Neill respectfully represents as follows:

Relief Requested

1. By this Motion, O’Neill requests an order extending the deadline to file its final fee application, pursuant to the Confirmation Order, until June 26, 2019.
2. On November 16, 2018, the Debtors filed the *Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation* (the “Plan”) [ECF No. 352].
3. On February 4, 2019, the Court entered the *Order and Judgment Confirming the Third Amended Title III Plan of the Puerto Rico Sales Tax and Financing Corporation* (the “Confirmation Order”) [ECF No. 561].
4. The Plan became effective on February 12, 2019 [ECF No. 587].
5. Pursuant to Section 27 of the Plan, O’Neill has until today, June 12, 2019, to “file its application for final allowance of compensation for professional services rendered and reimbursement of expenses.” [ECF No. 561, at 21].
6. O’Neill is in the process of drafting its final application for final allowance of compensation. In order to finalize and file the application, O’Neill will require fourteen (14)

² PROMESA has been codified in 48 U.S.C. §§ 2101–2241.

days, that is, until June 26, 2019. Accordingly, O'Neill requests an extension of fourteen (14) days to submit its final application.

7. O'Neill obtained the consent of the Fee Examiner and AAFAF for this extension of time.

8. O'Neill hereby certifies that there is a true need for urgent relief and that such urgency was not created through any lack of due diligence.

9. No prior request for the relief sought in this Motion has been made to this or any other court.

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WHEREFORE O'Neill respectfully requests the Court to enter the Proposed Order attached hereto as **Exhibit A**, granting the relief requested herein and all other relief that is just and proper.

Dated: June 12, 2019
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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*Attorneys for the Financial
Oversight and Management Board
as Representative for the Debtors*

Exhibit A

Proposed Order

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**ORDER EXTENDING DEADLINE TO
FILE APPLICATION FOR FINAL ALLOWANCE OF COMPENSATION**

Upon the *Urgent Motion Seeking Extension of Deadline to File Application for Final Allowance of Compensation* (the “Motion”);² and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is

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² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

proper pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. The deadline for O'Neill & Borges LLC to file its application for final allowance of compensation shall be extended to **June 26, 2019**.
3. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.
4. This Order resolves docket entry no. _____.

SO ORDERED.

Dated: _____, 2019
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
United States District Judge